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March 20, 2021

By ECF/EmailThe Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007*United States v. Anilesh Ahuja*, 18 Cr. 328 (KPF)

Dear Judge Failla:

We write briefly in response to the government's letter filed this morning. We apologize to the government and to the Court for not seeking the government's view before filing our letter.

As to the requested extension itself, we note that the issues before the Court involve an extensive record that played out over the course of years, and included discovery, pre-trial motion practice, Rule 17(c) subpoenas, trial, post-trial proceedings, a stayed appeal, further post-trial proceedings, and a defense FOIA request. The issues likewise involve multiple cooperating witnesses and their lawyers. Our request for more time to prepare our motions is not based on a desire to prolong or delay these proceedings, but rather to present the Court with what we believe are serious issues in as efficient a form as possible.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

The Honorable Katherine Polk Failla

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With respect to the government's conflicts, we are of course willing to accommodate any scheduling issues that bear on the government's opposition and, if the Court allows it, oral argument on the motions. We reached out to the government shortly after receiving their letter this morning but have not yet heard back and wanted to submit this letter before the Court ruled on our request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Roberto Finzi".

Roberto Finzi

Richard C. Tarlowe

cc: Counsel of Record